

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-01771-TSC**

CAMPAIGN LEGAL CENTER v. UNITED STATES
DEPARTMENT OF JUSTICE
Assigned to: Judge Tanya S. Chutkan
Case: 1:18-cv-01187-TSC
Cause: 05:552 Freedom of Information Act

Date Filed: 07/30/2018
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

CAMPAIGN LEGAL CENTER

represented by **Adam B. Miller**
BUCKLEY LLP
2001 M Street, NW
Suite 500
Washington, DC 20036
(202) 349-7958
Fax: (202) 349-8080
Email: amiller@buckleyfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Danielle M. Lang
CAMPAIGN LEGAL CENTER
1101 14th Street, NW
Suite 400
Washington, DC 20005
(202) 736-2200
Fax: (202) 736-2222
Email: dlang@campaignlegalcenter.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Nadav Ariel
BUCKLEY LLP
2001 M Street, NW
Suite 500
Washington, DC 20036
(202) 349-8012
Fax: (202) 349-8080
Email: nariel@buckleyfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**UNITED STATES DEPARTMENT
OF JUSTICE**

represented by **Paul Cirino**
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2529
Fax: (202) 252-2599
Email: paul.cirino@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA

555 Fourth Street, NW
 Washington, DC 20530
 (202) 252-2541
 Fax: (202) 252-2599
 Email: joshua.kolsky@usdoj.gov
 TERMINATED: 12/21/2018

Date Filed	#	Docket Text
07/30/2018	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF JUSTICE (Filing fee \$ 400 receipt number 0090-5611117) filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4, # <u>5</u> Exhibit 5, # <u>6</u> Exhibit 6, # <u>7</u> Summons, # <u>8</u> Civil Cover Sheet with Notice of Related Case)(Miller, Adam) (Entered: 07/30/2018)
07/30/2018	<u>2</u>	LCvR 7.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by CAMPAIGN LEGAL CENTER (Miller, Adam) (Entered: 07/30/2018)
07/30/2018	<u>3</u>	NOTICE OF RELATED CASE by CAMPAIGN LEGAL CENTER. Case related to Case No. 18-1187. (sth) (Entered: 07/31/2018)
07/30/2018		Case Assigned to Judge Tanya S. Chutkan. (zsth) (Entered: 07/31/2018)
07/31/2018	<u>4</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zsth) (Entered: 07/31/2018)
08/07/2018	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 8/1/2018. Answer due for ALL FEDERAL DEFENDANTS by 8/31/2018. (Miller, Adam) (Entered: 08/07/2018)
08/07/2018	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 08/01/2018. (Miller, Adam) (Entered: 08/07/2018)
08/07/2018	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF JUSTICE served on 8/1/2018 (Miller, Adam) (Entered: 08/07/2018)
08/30/2018	<u>8</u>	NOTICE of Appearance by Joshua M. Kolsky on behalf of UNITED STATES DEPARTMENT OF JUSTICE (Kolsky, Joshua) (Entered: 08/30/2018)
08/30/2018	<u>9</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF JUSTICE.(Kolsky, Joshua) (Entered: 08/30/2018)
08/31/2018		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. The requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil procedure appear to be inapplicable. IT IS HEREBY ORDERED that the parties shall meet and confer and propose a schedule for proceeding in this matter. The schedule shall address the status of Plaintiff's FOIA request, the anticipated number of documents responsive to Plaintiff's FOIA request, the anticipated date(s) for release of the documents requested by Plaintiff, whether a motion for an Open America stay is likely in this case, whether a Vaughn index will be required in this case, whether and when either party anticipates filing a dispositive motion, and any other pertinent issues. The parties shall file a joint status report that addresses these issues and that contains a proposed schedule and proposed order no later than 9/28/18. Signed by Judge Tanya S. Chutkan on 8/31/8. (DJS) (Entered: 08/31/2018)
08/31/2018		Set/Reset Deadlines: Joint Status Report due by 9/28/2018. (tb) (Entered: 08/31/2018)
09/04/2018	<u>10</u>	NOTICE of Appearance by Danielle M. Lang on behalf of CAMPAIGN LEGAL CENTER (Lang, Danielle) (Entered: 09/04/2018)
09/05/2018		Set/Reset Deadlines: Joint Status Report due by 9/28/2018. (tb) (Entered: 09/05/2018)
09/28/2018	<u>11</u>	Joint STATUS REPORT by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Exhibit Exhibit A – Declaration of Joseph F. Klimavicz, # <u>2</u> Exhibit Exhibit B – CLC

		Proposed Order, # <u>3</u> Exhibit Exhibit C – DOJ Proposed Order)(Miller, Adam) (Entered: 09/28/2018)
10/24/2018		MINUTE ORDER: A Status Conference is hereby set for 10/31/18 at 10:30 am in Courtroom 9. Signed by Judge Tanya S. Chutkan on 10/24/18. (DJS) (Entered: 10/24/2018)
10/25/2018		Set/Reset Hearings: Status Conference set for 10/31/2018 at 10:30 AM in Courtroom 9 before Judge Tanya S. Chutkan. (tb) (Entered: 10/25/2018)
10/26/2018	<u>12</u>	NOTICE of Appearance by Nadav Ariel on behalf of CAMPAIGN LEGAL CENTER (Ariel, Nadav) (Entered: 10/26/2018)
10/31/2018		Minute Entry for proceedings held before Judge Tanya S. Chutkan: Status Conference held on 10/31/2018. The Court directed the parties to submit a Joint Status Report on or before December 17, 2018. (Order forthcoming.) (Court Reporter Bryan Wayne.) (tg) Modified to add deadline on 10/31/2018 (tg). (Entered: 10/31/2018)
10/31/2018		Set/Reset Deadlines: Joint Status Report due by 12/17/2018. (tg) (Entered: 10/31/2018)
10/31/2018		MINUTE ORDER: Having considered the parties' Joint Status Report <u>11</u> and the updates provided at the October 31, 2018 Status Conference, the parties are ordered to adhere to the following deadlines. With respect to the FOIA requests made to the Justice Management Division, the 170 pages that were referred to the Office of Information Policy, the 40 pages that were referred to the Department of Commerce, and 5 pages that were referred to the Census Bureau shall be processed and produced on or before December 12, 2018. Further, the status report, due on or before December 17, 2018, shall include, but not necessarily be limited to, the following: (1) an update on the production due on or before December 12, 2018; (2) an update on whether the searches that are scheduled to be rerun in the next three months are duplicative of Plaintiff's requests; (3) an update on whether the fact that the instant request was granted expedited processing should result in it advancing in the queue; (4) a production schedule for the documents that are responsive to the requests made to the Office of the Attorney General; and (5) a proposed status conference date. In addition, the parties are directed to file, three days before the next status conference, a proposed summary judgment briefing schedule. Signed by Judge Tanya S. Chutkan on 10/31/2018. (lctsc1) (Entered: 10/31/2018)
12/17/2018	<u>13</u>	Consent MOTION for Extension of Time to File <i>Joint Status Report</i> by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Kolsky, Joshua) (Entered: 12/17/2018)
12/17/2018		MINUTE ORDER: Granting <u>13</u> Motion for Extension of Time to File to File Joint Status Report. Joint Status and proposed order due 1/5/19. Signed by Judge Tanya S. Chutkan on 12/17/18. (DJS) (Entered: 12/17/2018)
12/19/2018		Set/Reset Deadlines: Joint Status Report due by 1/5/2019. (tb) (Entered: 12/19/2018)
12/21/2018	<u>14</u>	ENTERED IN ERROR. . . .NOTICE OF SUBSTITUTION OF COUNSEL by Paul Cirino on behalf of UNITED STATES DEPARTMENT OF JUSTICE Substituting for attorney Joshua M. Kolsky (Cirino, Paul) Modified on 1/4/2019 (ztd). (Entered: 12/21/2018)
01/04/2019		NOTICE OF ERROR re <u>14</u> Substitution of Counsel; emailed to paul.cirino@usdoj.gov, cc'd 9 associated attorneys — The PDF file you docketed contained errors: 1. Incorrect header/caption/case number, 2. Please refile document, 3. Document has the incorrect case number (ztd,) (Entered: 01/04/2019)
01/07/2019	<u>15</u>	MOTION to Stay <i>in Light of Lapse in Appropriations</i> by UNITED STATES DEPARTMENT OF JUSTICE (Cirino, Paul) (Entered: 01/07/2019)
01/07/2019	<u>16</u>	RESPONSE re <u>15</u> MOTION to Stay <i>in Light of Lapse in Appropriations</i> filed by CAMPAIGN LEGAL CENTER. (Ariel, Nadav) (Entered: 01/07/2019)
01/24/2019	<u>17</u>	NOTICE of Change of Law Firm Name by CAMPAIGN LEGAL CENTER (Ariel, Nadav) (Entered: 01/24/2019)

01/28/2019	<u>18</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Paul Cirino on behalf of UNITED STATES DEPARTMENT OF JUSTICE Substituting for attorney Joshua Kolsky (Cirino, Paul) (Entered: 01/28/2019)
02/15/2019	<u>19</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order (Plaintiff's Proposal), # <u>2</u> Text of Proposed Order (Defendant's Proposal))(Cirino, Paul) (Entered: 02/15/2019)
02/19/2019		MINUTE ORDER: Having considered the parties' February 15, 2019 Joint Status Report <u>19</u> , the parties are ordered to adhere to the following deadlines. With respect to Plaintiff's request for records of the Office of the Attorney General, Defendant shall complete its production of non-exempt responsive records by March 29, 2019. And on or before April 5, 2019, the parties shall file a status report, which includes a proposed summary judgment briefing schedule. A status conference is set for April 11, 2019 at 11:00 a.m., in Courtroom 9. Further, the motion <u>15</u> to stay is TERMINATED as moot. Signed by Judge Tanya S. Chutkan on 2/19/2019. (lctsc1) (Entered: 02/19/2019)
02/21/2019		Set/Reset Deadlines/Hearings: Status Report due by 4/5/2019. Status Conference set for 4/11/2019 at 11:00 AM in Courtroom 9 before Judge Tanya S. Chutkan. (tb) (Entered: 02/21/2019)
04/05/2019	<u>20</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF JUSTICE. (Cirino, Paul) (Entered: 04/05/2019)
04/11/2019		Minute Entry: Status Conference held on 4/11/2019 before Judge Tanya S. Chutkan: Cross Motion due by 5/22/2019. Response to Cross Motion due by 6/5/2019. Reply to Cross by 6/12/2019. Summary Judgment motion due by 5/8/2019. Response to Motion for Summary Judgment due by 5/22/2019. Reply to Motion for Summary Judgment due by 6/5/2019. (Court Reporter Scott Wallace) (tb) (Entered: 04/12/2019)
04/17/2019		MINUTE ORDER: Defendant's Motion for summary judgment due by 5/8/2019. Plaintiff's combined response/cross-motion for summary judgment due by 5/22/2019. Defendant's combined reply/response due 6/5/2019. Plaintiff's reply due by 6/12/2019. Signed by Judge Tanya S. Chutkan on 4/17/19. (DJS) Modified on 4/18/2019 (tb). (Entered: 04/17/2019)
04/30/2019	<u>21</u>	NOTICE of Change of Address by Nadav Ariel (Ariel, Nadav) (Entered: 04/30/2019)
05/08/2019	<u>22</u>	MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Declaration of Michael H. Allen (with JMD Vaughn Index), # <u>4</u> Declaration of Vanessa R. Brinkmann (with Exhibits and OIP Vaughn Index), # <u>5</u> Declaration of Tink Cooper, # <u>6</u> Exhibits A-G to Cooper Declaration, # <u>7</u> Exhibits H-L to Cooper Declaration, # <u>8</u> Civil Rights Division Vaughn Index, # <u>9</u> Text of Proposed Order)(Cirino, Paul) (Entered: 05/08/2019)
05/22/2019	<u>23</u>	RESPONSE re <u>22</u> MOTION for Summary Judgment filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Declaration of Nadav Ariel, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 4, # <u>6</u> Exhibit 5, # <u>7</u> Exhibit 6, # <u>8</u> Exhibit 7, # <u>9</u> Exhibit 8, # <u>10</u> Exhibit 9, # <u>11</u> Exhibit 10, # <u>12</u> Exhibit 11, # <u>13</u> Exhibit 12, # <u>14</u> Exhibit 13, # <u>15</u> Exhibit 14, # <u>16</u> Exhibit 15, # <u>17</u> Exhibit 16, # <u>18</u> Text of Proposed Order)(Ariel, Nadav) (Entered: 05/22/2019)
05/22/2019	<u>24</u>	Cross MOTION for Summary Judgment by CAMPAIGN LEGAL CENTER (Attachments: # <u>1</u> Declaration of Nadav Ariel, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 4, # <u>6</u> Exhibit 5, # <u>7</u> Exhibit 6, # <u>8</u> Exhibit 7, # <u>9</u> Exhibit 8, # <u>10</u> Exhibit 9, # <u>11</u> Exhibit 10, # <u>12</u> Exhibit 11, # <u>13</u> Exhibit 12, # <u>14</u> Exhibit 13, # <u>15</u> Exhibit 14, # <u>16</u> Exhibit 15, # <u>17</u> Exhibit 17, # <u>18</u> Text of Proposed Order)(Ariel, Nadav) (Entered: 05/22/2019)
06/05/2019	<u>25</u>	REPLY to opposition to motion re <u>22</u> MOTION for Summary Judgment filed by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration (Second) of Vanessa R. Brinkmann, # <u>2</u> Declaration (Supplemental) of Tink Cooper, # <u>3</u> Response to Plaintiff's Statement of Undisputed Facts)(Cirino, Paul) (Entered: 06/05/2019)
06/05/2019	<u>26</u>	Memorandum in opposition to re <u>24</u> Cross MOTION for Summary Judgment filed by UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration

		(Second) of Vanessa R. Brinkmann, # <u>2</u> Declaration (Supplemental) of Tink Cooper, # <u>3</u> Response to Plaintiff's Statement of Undisputed Facts, # <u>4</u> Text of Proposed Order)(Cirino, Paul) (Entered: 06/05/2019)
06/12/2019	<u>27</u>	REPLY to opposition to motion re <u>24</u> Cross MOTION for Summary Judgment filed by CAMPAIGN LEGAL CENTER. (Attachments: # <u>1</u> Declaration Declaration of N. Ariel, # <u>2</u> Exhibit Exhibit A, # <u>3</u> Exhibit Exhibit B)(Ariel, Nadav) (Entered: 06/12/2019)